

From: START <START@ene.com>
To: "COLLINS.LAMONICA@EPAMAIL.EPA.GOV" <COLLINS.LAMO...
Date: 4/22/98 8:45am
Subject: CASTEX OIL SPILL RESPONSE POLREP 7

POLREP NO: 7 (REMOVAL)

Date: 04/20/98
Subject: CASTEX SYSTEMS REMOVAL
From: Mike Ryan, OSC, U.S. EPA, Region 6, ERB (214/665-2270)
To: Director, ERD and Region 6
Charles A. Gazda, Chief, ERB, Region 6
Case Officer, Case Team 1, USCG NPFC
Commanding Officer, USCG-D8(m)
Commanding Officer, MLC-LANT Contracting Officer
Commanding Officer, USCG Gulf Strike Team
Louisiana Department of Environmental Quality (LDEQ)

Site ID#:	CERCLIS No: N/A
FPN No: 08-6-144	Delivery Order No: Awaiting MLC-LANT Response
Authority: OPA	ERNS No: N/A
NPL Status: N/A	Action Lead: FUND
State Notification: LDNR	Start Date: 8/19/96
Incident Category:	Completion Date:
Inactive Disposal Facility	
Action Memorandum Status: N/A	Event Qualifier: ER

I. SITUATION INFORMATION

A. Site description

The Castex System Site is a nonhazardous oil-field waste (NOW) disposal facility that was abandoned in 1989 shortly after a fire and catastrophic failure of the produced water storage tank battery. The site is located at Lat 30° 11' 20", Lon 92° 36' 55", approximately three miles southeast of Jennings, Jefferson Davis Parish, Louisiana. The facility is in a rural area and is situated adjacent to a marsh and one mile west of the Mermentau River.

B. Description of threat

Approximately 9700 barrels (bbls) of NOW fluids are contained in 19 above ground storage tanks (ASTs), varying in condition from fair to poor. The failed storage tanks contained naturally occurring radioactive material

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(NORM) sediments that were spilled into the containment basin and mixed with oily sludge. The containment basin has been breached on the south side and is releasing oily water and NORM sediments into the marsh. The marsh flows into the Mermentau River which flows through Grand Lake to the Gulf of Mexico. The facility also has eleven waste management units (WMUs) that contain approximately 20,400 bbls of oil-based material, 96,319 bbls of salt-base material, and 17,100 bbls of rainwater. Chemicals of concern are barium, arsenic, benzene, crude oil waste, and NORM.

C. Preliminary Assessment Results

Air monitoring around the ASTs and WMUs for volatile organic compounds (VOCs), percent oxygen and the lower explosive limit (LEL) indicated no readings significantly different from background. The soil in the primary containment basin has readings of 500 microroetgens/hour (uR/hr), according to a 1995 LDNR survey, which qualifies the material as NORM by Louisiana regulations.

Preliminary results of EPA analytical data indicate that no area composite sample exceeded RCRA regulatory limits for TCLP Metals or Pesticides/PCBs. Analysis of AREA-J composite sample indicated 37 pC/g for Radium 226 and 15 pC/g for Radium 228. Analysis of the composite sample of tanks T11-T14 indicated 35 pC/g for Radium 226 and 16 pC/g for Radium 228. Analysis of AREA-Q composite sample indicated 4.2 pC/g for Radium 226 and 3.0 pC/g for Radium 228.

D. Site History/Background

Historical actions taken: The Louisiana Department of Natural Resources (LDNR) permitted the facility to begin disposal of NOW material in September of 1982. The facility accepted oil- and water- based drilling mud, drill cuttings, produced saltwater, and oily water. Saltwater was injected into the salt water disposal (SWD) well and solids were stockpiled in WMUs for treatment. The LDNR ordered the facility closed in August of 1989, based on violations of Statewide Order No. 29-B, by Administrative Order No. UIC 89-2. The LDNR requested assistance from EPA Region 6 ERB in May of 1996.

II. SITE INFORMATION

A. Site Activities to Date

1. Initial Removal Action (July 23 through September 26, 1996)

EPA, USCG-GST, the Basic Ordering Agreement (BOA) contractor Emtech Environmental Services, and START mobilized to the site and began clearing weeds and debris from the site, delineating WMUs and NORM areas. Empty non-metal tanks and debris were disposed as non-hazardous debris at the Chemical Waste Management Facility in Carlyss, Louisiana (#LAD000777201). Metal debris is being scrapped and cleaned for resale. Bids for scrap are not yet finalized.

A quality assurance and sampling plan (QASP) was developed and implemented by the START to determine disposal requirements. Eighteen composite soil samples and nine tank waste composite and grab samples were collected and submitted for analysis of TCLP Metals, Pesticides/PCBs, Reactivity (Cyanides and Sulfides), Corrosivity, Ignitability, Total Recoverable Petroleum Hydrocarbons (TRPH), Radium 226, and Radium 228.

The EPA OSC met with the LDNR Injection and Mining Division (IMD) and arranged to have the on-site SWD well (SN 034959) tested for potential produced water disposal. On 11 September 1996 a second BOA contractor, Charles Holston, Inc. (CHI), conducted a mechanical integrity pressure test (MIPT) on the SWD well under supervision of LDNR-IMD. The well casing held pressure to 300 psig for 15 minutes. Salt water was pumped down the well at a maximum rate of 2 bbl/min and a maximum tubing pressure of 350 psig for approximately one hour. Based on the MIPT results, the LDNR-IMD approved the SWD well (SN 034959) for on-site water disposal.

CHI mobilized four 500 bbl frac tanks, two 18 hp, and three 5 micron filter sets to filter water and mix potassium chloride (KCl) to ensure proper water conditions for injection on 13 Sept. 1996. A third pump will inject on-site water to the 6000 foot sands at a rate of 2 bbl/min, or approximately 500 bbl/work-day. Before KCl chlorides adjustment or SWD well injection, a sample of each 500 bbl water batch will be analyzed by field chemistry methods for chlorides, conductivity, and pH. These samples will be turned over to LDNR-IMD disposition at the end of the project.

Box tank TB5 was emptied to mixing frac tank (FT1) and utilized as a oil/water separator before transferring through 5 micron filters to FT1. Due to excessive filter use, the BOA contractor constructed a sand-bed filter to reduce emulsified oil from the waste water before particulate filtering.

The first 500 bbl batch of on-site water was adjusted to a salinity to 8700 with potassium chloride. Disposal injection began on 17 Sept. 1996. The packing on the casing failed on 18 September 1996 after injection of

308 bbls of water. CHI personnel and injection equipment was demobed pending bid analysis for well rework.

Piping connections to the tanks in Area I were cut using a pneumatic drill and band saws. The presence of residual drilling muds and VOC air pockets required safety monitoring for LEL during all drilling and cutting operations. Air monitoring was performed by USCG-GST.

EPA also met with LDEQ water quality division to brief LDEQ on EPA operations and determine any off-site water discharge limits. No water is expected to be discharged off-site. EPA is discussing various disposal and potential re-use options for other on-site NOW material based on LDNR Order 29-B guidelines for NOW facility closure.

The START prepared a preliminary sampling amendment for AREA A-G and collected seven composite soil samples for confirmation that LDNR Order 29-B compliance and reuse criteria are met. LDNR-IMD funded analysis of the samples at their contract lab. An LDNR-IMD representative received the samples on 23 September 1996.

At 0920 hours on 26 September 1996 the EPA OSC issued orders to demob the site due to notification received from the MLC-LANT contracting officer recending authorization of OPA funds for removal operations. The 1000 bbls of saline water was consolidated in two 500 bbl frac tanks. 500 bbls of filtered fresh water was transferred to AREA H containment and the remaining two frac tanks and filter pots were offsite by 1530 hours. All other equipment was deconed and demobed by 1600 hours on 26 September. START conducted data validation of the seventeen soil and nine waste sample analysis for Reactivity (Cyanides and Sulfides), Corrosivity, and Ignitability and the three soil and one waste sample analysis for Radium 226 and Radium 228. START also obtained a copy of the Castex Systems, Inc., bankruptcy petition number 87-92029 docket as requested by DOJ for cost recovery documentation.

2. Second Removal Action

On March 10, 1998, EPA conducted a site walk and planning meeting with LDNR, LDEQ, the local EOC, START, and the EPA ERRS contractor CET Environmental Services, Incorporated (CET). CET has replaced the BOA contractor EMTECH as the primary removal contractor.

EPA, USCG, START, and CET re-mobilized to site on April 6, 1998, to continue removal actions. The site was cleared of vegetation and a command post was mobilized to the site and connected to telephone and power.

On April 13, 1998, EPA, START, USCG, and CET attended an eight hour NORM awareness training, which is required by the State of Louisiana. The course was presented by Growth Resources Incorporated (GRI) of Lafayette, Louisiana. GRI has been subcontracted by CET provide a radiation safety officer (RSO) to oversee safety and disposal protocol for NORM removal and disposal activities. The RSO is responsible for the determination of the presence of NORM contamination on or in removed materials, as well as determine site safety PPE levels based on gas and airborne particulate sampling and any other, site decontamination controls, and all other NORM related issue.

CET has begun dismantling ASTs T10 through T14 with acetylene torches. A frac tank was mobilized to the site and filled with rainwater from Area A to facilitate fire control during cutting operations. All steel from the ASTs is checked for NORM contamination. Steel with NORM contamination will be sent to the GRI facility in Gibson, Louisiana for decontamination. Decontaminated steel will be sent for scrap and the removed NORM will be held at the GRI Gibson facility until disposal can be arranged, which will be dependant on the NORM concentration analysis. Non-contaminated scrap metal will shipped to LaRose Scrap in Intracoastal City, Louisiana, for recycling.

Fluids and sludge are being transferred from the ASTs T10 through T14 to 150 bbl containers which will be held on-site until disposal can be arranged. This will also be dependant on the NORM concentration analysis.

B. Next Steps:

EPA will continue to coordinate with LDEQ and LDNR for SWD well usage and state removal requirements. EPA is receiving and evaluating proposals for a SWD well pressure test to evaluate reason for the failure of the on-site injection well SWD well #1 in 1996 and it's potential for re-use. Failure of the SWD well was attributed to a leak in the upper casing around a previously welded section of piping.

RFPs are also being prepared for NOW and NORM waste disposal based on EPA, LDNR, and GSI analytical data. Final disposition of NORM will depend on disposal analytical results. Final disposition of NOW material will depend on LDNR's agreement of proposed EPA removal actions.

C. Key Issues:

Deed and Title Search and Review is on-going to determine current status of PRPs for enforcement action and cost recovery through the fund center.

III. PROPOSED ACTIONS

Dispose of NOW liquids, preferably through use of on-site injection well (SN 034959). Excavation of NOW solids and disposal of same at a state permitted facility. Excavation of NORM contaminated material and disposal of same at a state permitted facility. P&A the SWD well and restore site to grade.

IV. COST INFORMATION

1. Initial Removal Action (July 23 through September 26, 1996)

FPN: \$ 250,000.00

Ceiling	Cost to date	
Contractor (EMTECH):	\$ 125,000	
Personnel		\$ 51,123.98
Equipment		\$ 19,972.60
Material		\$ 650.36
Sub-Contract		\$ 1,567.43
Contractor Total:		\$ 73,314.37

Contractor (Holston):	\$25,000	
Personnel		\$ 3,418.50
Equipment		\$ 4,389.50
Material		\$ 1,050.44
Sub-Contract		\$ 10,199.75
Contractor Total:		\$ 19,058.19

Government:	\$ 100,000	
EPA		\$ 9,041.00
USCG-GST		\$ 19,117.80
START		\$
13,415.16		
Government Total		\$ 41,573.96

SITE TOTAL (July 23 through September 26, 1996):	\$133,946.52
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2. Second Removal Action(March 10 through COB April 20, 1998)

Contractor (CET):	\$ 250,000	
Personnel		\$ 27,651.52
Equipment		\$ 1,170.93
Other		\$ 93,036.21
Contractor Total:	\$121,858.56	

Government:	\$ 50,000	
EPA		\$ 3,506.00
USCG-GST		\$ 7,064.20
START		\$
4,731.00		
Government Total	\$ 15,301.20	

SITE TOTAL (March 10 through COB April 20, 1998): **\$137,159.76**

COMBINED SITE TOTAL: **\$271,106.28**

V. DISPOSITION OF WASTE

Not Applicable at this time.

Case Pends

OSC: Mike Ryan P.E.
START PM: Will Farrar

CC: **"DCROW@ENE.COM" <DCROW@ENE.COM>, "Mike Ryan (E-m...**